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12 *Counsel for Plaintiff and the Putative Class*

13 **UNITED STATES DISTRICT COURT**

14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 CATHE WATSON, individually and on  
behalf of all others similarly situated,

16 *Plaintiff,*

17 v.

18 AMERICREDIT FINANCIAL SERVICES,  
19 INC., a Delaware corporation d/b/a GM  
FINANCIAL, and GENERAL MOTORS  
20 FINANCIAL CO. INC., a Texas corporation  
d/b/a GM FINANCIAL,

21 *Defendants.*  
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Case No. 3:14-cv-00476-DMS-BLM

Honorable Dana M. Sabraw

Magistrate Judge Barbara Lynn Major

**NOTICE OF VOLUNTARY DISMISSAL**

1           **PLEASE TAKE NOTICE** that Plaintiff Cathe Watson, by and through her undersigned  
 2 counsel and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), hereby voluntarily  
 3 dismisses her individual claims against Defendants Americredit Financial Services, Inc. d/b/a GM  
 4 Financial and General Motors Financial Co., Inc. d/b/a GM Financial (“Defendants”), *without*  
 5 *prejudice* and the claims of the putative class she sought to represent *without prejudice*. In support  
 6 of the instant notice, Plaintiff states as follows:

7           1.       Plaintiff filed her putative Class Action Complaint against Defendants on March 3,  
 8 2014. (Dkt. 1.)

9           2.       Federal Rule of Civil Procedure 41(a)(1)(A) provides, in relevant part, that a  
 10 “plaintiff may dismiss an action without court order by filing . . . a notice of dismissal before the  
 11 opposing party serves either an answer or a motion for summary judgment.”

12           3.       Defendants have not served answers or motions for summary judgment in this  
 13 action.

14           4.       Accordingly, this action may be dismissed *without prejudice* as to Plaintiff’s  
 15 individual claims against Defendants and *without prejudice* as to the claims of the putative class  
 16 Plaintiff sought to represent, without an Order of the Court.

17                               Respectfully submitted,

18                               **CATHE WATSON**, individually and on behalf of all  
 19 others similarly situated,

20 Dated: April 16, 2014

By: /s/ Mark S. Eisen  
 One of Plaintiff’s Attorneys

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 16, 2014, I served the foregoing by causing true and accurate copies of such paper to be filed with the Court's CM/ECF filing system, and by transmitting the same to the parties and counsel identified below by electronic mail.

***Newman v. Americredit Fin. Servs., Inc., No. 3:11-cv-03041-DMS-BLM (S.D. Cal.):***

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/s/ Mark S. Eisen  
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